

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Terencio Campos, Angelo Demello & Cynthia Demello,

Plaintiffs,

07-cv-7068 (KMK)

vs.

BASF Catalysts, LLC,

Defendant.
-----x

MEMO ENDORSED

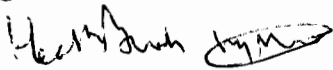
PARTIES' JOINT PRE-CONFERENCE SUBMISSION

Counsel for the parties having conferred between themselves and the attached document representing the position of the parties on the merits of this controversy, they jointly propose the following discovery schedule:

1. Rule 26(a) disclosures will be served by 12/13/07.
2. Initial interrogatories and requests to produce will be served by January 15, 2008 with the understanding that either party may thereafter serve such demands within the discovery period.
3. Depositions shall commence no later than February 15, 2008 and all fact depositions will be completed by May 1, 2008. The parties currently anticipate that each side shall take no more than ten depositions and that they can complete these within the proposed time period.
4. By April 15, 2008, plaintiffs shall provide the identification of any expert witnesses, with curriculum vitae and other information required by the Federal Rules of Civil Procedure.
5. By May 10, 2008, plaintiffs shall provide any expert report.
6. By June 10, 2008, defendant shall provide required expert disclosure, including a report from its expert.

7. By June 20, 2008, plaintiffs shall submit any rebuttal report from their expert.
8. All discovery, including the depositions of experts, shall close on July 15, 2008.
9. Defendant reserves the right to move to sever the claims in this action.
10. The parties recognize that any extensions or changes to this Order will be made only upon a showing of good cause and shall cooperate to meet the discovery deadlines set forth herein.

Agreed:




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SO ORDERED:



UNITED STATES DISTRICT COURT
12/7/07

11. The Court will hold a case management conference on September 12, 2008, at 10:00. Any motions that the parties wish to make will be discussed, consistent with the Court's pre-motion practices.